

EXHIBIT C

LAKESHA STEVENSON
UNITED STATES vs STATE OF GEORGIA

September 22, 2022

1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4
5 UNITED STATES OF)
6 AMERICA,)
7 Plaintiff,)
8 vs.)
9 STATE OF GEORGIA,) Civil Action No.
10 Defendant.) 1:16-CV-03088-ELR
11 _____)
12
13 DEPOSITION OF
14 LAKESHA STEVENSON
15
16 DATE: Thursday, September 22, 2022
17
18 TIME: 9:00 a.m. - 5:26 p.m.
19
20 LOCATION: 500 Fourteenth Street Northwest
21 Atlanta, Georgia 30318
22
23 REPORTED BY: Tamika Burnette, RPR, CSR No. 2870
24
25

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1	Q. Well, actually, just pause for one second.	09:32AM
2	THE VIDEOGRAPHER: Yeah, let's go off the	09:32AM
3	record.	09:32AM
4	MS. TUCKER: Yes, we'll go off the record	09:32AM
5	for one second.	09:33AM
6	(Off the record.)	09:33AM
7	THE VIDEOGRAPHER: At 9:34 a.m.	09:33AM
8	(Off the record at 9:34 a.m.)	09:35AM
9	THE VIDEOGRAPHER: Stand by. Back on the	09:35AM
10	record at 9:36 a.m.	09:35AM
11	Q. BY MS. TUCKER: Dr. Stevenson, let's turn back	09:35AM
12	to your resume that starts with GA02598823, just to	09:35AM
13	learn a little bit more about your professional	09:35AM
14	background.	09:35AM
15	Who is your current employer?	09:35AM
16	A. Georgia Department of Education.	09:36AM
17	Q. Okay. And this is in the GNETS program	09:36AM
18	specialist role?	09:36AM
19	A. Yes.	09:36AM
20	Q. Okay. When did you officially assume this	09:36AM
21	position?	09:36AM
22	A. In 2018.	09:36AM
23	Q. Do you remember what month?	09:36AM
24	A. I do not.	09:36AM
25	Q. Okay. And then who did you interview with?	09:36AM

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1	A. I know Vickie Cleveland was there, and I do not	09:36AM
2	remember who else was there.	09:36AM
3	Q. Okay. Do you remember if it was quickly after	09:36AM
4	you applied?	09:36AM
5	A. I do not.	09:36AM
6	Q. Okay. And do you report to Vickie Cleveland?	09:36AM
7	A. Yes.	09:36AM
8	Q. Okay. And earlier you said her role was	09:36AM
9	program manager --	09:36AM
10	A. Yes.	09:36AM
11	Q. -- for GNETS?	09:36AM
12	A. Yes.	09:36AM
13	Q. Okay. Have you always reported to Vickie	09:36AM
14	Cleveland in this role?	09:36AM
15	A. In this role, yes.	09:36AM
16	Q. Okay. Did you know Vickie Cleveland before	09:37AM
17	assuming this position?	09:37AM
18	A. Yes.	09:37AM
19	Q. Okay. How did you know Vickie Cleveland?	09:37AM
20	A. We worked at the Georgia Department of	09:37AM
21	Education together.	09:37AM
22	Q. Okay. In what roles in GaDOE had you worked	09:37AM
23	together before?	09:37AM
24	A. She was a program specialist for the	09:37AM
25	Results-Driven Accountability unit, and I also was a	09:37AM

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1 A. It was discussed during preplanning. There's a
2 presentation of a lot of different things and that was
3 one of the things they discussed.

4 Q. Okay. So during your times teaching in a
5 special education leads, you never -- am I correct that
6 you did not have a student attend GNETS?

A. I did not have a student attend GNETS.

8 Q. Okay. Thank you. I'm interested in learning
9 more about your role as a GNETS program specialist?

10 A. Mm-hmm.

Q. Why did you choose to apply in July 2018?

12 A. I've always worked with students that had
13 emotional behavioral disorders.

14 Q. Okay.

15 A. So that was one of the reasons I applied for
16 the job. I was also -- I've always also been interested
17 in learning more -- I wouldn't say learning more, I
18 would just say because of my work, my previous work with
19 students with emotional behavioral disorders.

20 Q. Okay. Thank you.

21 MS. TUCKER: I'd like the Court Reporter to
22 mark this document as Plaintiff's Exhibit 420.

23 (Plaintiff's Exhibit 420 marked for
24 identification.)

25 Q. BY MS. TUCKER: I'll wait until you get it.

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1 Okay. The Bates number on the first page of this
2 exhibit is GA00119322. This is a July 2018 e-mail
3 thread, including Crystal Albright, Karen Flowers,
4 Zelphine Smith-Dixon, Vickie Cleveland, and Shanita
5 Howard. The most recent e-mail in the thread is dated
6 July 29th, 2018, with a subject of "Permission to post
7 new position GNETS." There's one attachment.

8 A. (Witness examining document.)

9 Q. Dr. Stevenson, please take a look at the
10 attachment beginning at GA00119324. The top reads that
11 it's a posting for job 18-77 GNETS program specialist.

12 A. (Witness examining document.)

13 Q. Do you recognize this as the job posting that
14 you applied for?

15 A. Yes.

16 Q. Okay. Let's turn back to that cover e-mail.
17 Who is Crystal Albright?

18 A. I don't know.

19 Q. Okay. Who is

A. I think she was a budget ana

Q. Okay. Who is Shanita Howard?

A. I don't know.

23 | 0 Okay And th

24 A She is the former Special Education director

for the State of Georgia.



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1	GNETS program needed additional people?	09:53AM
2	A. Mm-hmm.	09:53AM
3	Q. Is that a yes?	09:53AM
4	A. Yes.	09:53AM
5	Q. Okay. Great. What -- were they saying	09:53AM
6	anything else about the job?	09:53AM
7	A. No.	09:53AM
8	Q. Okay. Let's take a look at the box with the	09:53AM
9	two paragraphs towards the top. The box starts with	09:53AM
10	"Provides general supervision."	09:53AM
11	A. Mm-hmm.	09:53AM
12	Q. Do you see that?	09:53AM
13	A. Yes.	09:53AM
14	Q. Okay. I want you to take a look at the	09:53AM
15	description. And would you agree that this box	09:53AM
16	describes the duties of the GNETS program specialist?	09:53AM
17	A. (Witness examining document.) Yes.	09:53AM
18	Q. Okay. Thank you, Dr. Stevenson. Let's look at	09:54AM
19	this a little bit more. Where the post -- do you see	09:54AM
20	where the posting reads: "Provides general supervision	09:54AM
21	for the Georgia Network for Educational and Therapeutic	09:54AM
22	Support, GNETS"?	09:54AM
23	A. Yes.	09:54AM
24	Q. As GNETS program specialist, in what ways do	09:54AM
25	you provide general supervision for GNETS?	09:54AM

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1 A. I provide general supervision for GNETS by
2 answering any questions that the directors may have in
3 regards to the strategic plan or the grant application
4 or i-Ready, Basc, or any of the programs that -- that
5 they use.

6 Q. Okay. So you answer questions?

7 A. Mm-hmm.

8 Q. What other ways do you provide supervision?

9 A. By reviewing grant applications and the
10 strategic plan.

11 Q. Okay. Next, do you see where it reads:
12 "Duties include collaborating with the Georgia
13 Department of Education GaDOE team by building
14 professional learning structures"?

15 A. Mm-hmm.

16 Q. Okay. As GNETS program specialist, in what
17 ways do you build professional learning structures?

18 A. We collaborate with -- for example, we
19 collaborate -- collaborated with Georgia State for the
20 FBA/BIP training.

21 Q. Yes?

22 A. We also did a collaboration with Georgia State
23 for trauma-informed care.

24 Q. Okay.

25 A. We will also collaborate with colleagues within

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1 A. -- maybe.

2 Q. Okay. Do you see where it reads: "Duties
3 include providing technical assistance with strategic
4 planning and implementation activities --

5 A. Mm-hmm.

6 Q. -- including presentation materials and
7 mechanisms to ensure common standards of practice across
8 the GNETS network are followed with fidelity"?

9 A. Yes.

10 Q. Okay. As GNETS program specialist, in what
11 ways do you ensure common standards of practice across
12 GNETS are followed with fidelity?

13 A. By reviewing the strategic plan.

14 Q. What kind of common standards are there?

15 MS. JOHNSON: Objection.

16 THE WITNESS: Whatever is within the
17 strategic plan.

18 Q. BY MS. TUCKER: Okay. And we'll take a look at
19 the strategic plan later.

20 So do you agree that there are common
21 standards of practice across the GNETS network?

22 MS. JOHNSON: Objection.

23 THE WITNESS: There -- there are things
24 within the strategic plan that all the GNETS are aware
25 of.

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1 A. I would have to sit and think about that. 10:02AM

2 Q. Okay. And I'm correct, I believe, that you
3 assumed this job in 20 -- October 2018. Does that sound 10:02AM
4 right? 10:02AM

5 A. Yes. 10:02AM

6 Q. Okay. Were you notified prior to October 2018 10:02AM
7 that you would be in this position? 10:02AM

8 A. No. 10:02AM

9 Q. Okay. 10:02AM

10 MS. TUCKER: I'd like the Court Reporter to 10:03AM
11 mark this document as Plaintiff's Exhibit 421. 10:03AM

12 (Plaintiff's Exhibit 421 marked for 10:03AM
13 identification.) 10:03AM

14 MS. TUCKER: Great. Thank you. 10:03AM

15 Q. BY MS. TUCKER: The Bates number on the first 10:03AM
16 page of this exhibit is GA00953298. 10:03AM

17 A. (Witness examining document.) 10:03AM

18 Q. This is an October 29th, 2019 e-mail from 10:03AM
19 Vickie Cleveland to you. The subject reads: 10:03AM
20 "Responsibilities." And there's one attachment. 10:03AM

21 Dr. Stevenson, do you recognize this e-mail 10:04AM
22 and attachment? 10:04AM

23 A. Yes. 10:04AM

24 Q. Okay. Let's turn to the attachment with -- at 10:04AM
25 the bottom. The Bates number reads GA00953299. The top 10:04AM

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1 of the document reads: "GNETS program specialist
2 responsibilities." And there's a box with bulleted
3 responsibilities.

4 Dr. Stevenson, did you create this
5 document?

6 A. I don't think so.

7 Q. Okay. Would you think that Vickie created it
8 since she sent it to you?

9 MS. JOHNSON: Objection.

10 THE WITNESS: I'm not sure. She -- she
11 sent it to me based on what this says, but I'm not sure
12 if she created it.

13 Q. BY MS. TUCKER: Okay. But you did receive this
14 from Vickie Cleveland?

15 A. That's what the e-mail says.

16 Q. And these are e-mails we received from the
17 State.

18 A. Okay.

19 Q. Okay. I'd love for you to take a look at the
20 document and responsibilities. And then would you agree
21 that it identifies your responsibilities as GNETS
22 program specialist?

23 A. Yes.

24 Q. Okay. It's quite a long list. I know you're
25 busy, but I'd like to go through them. Starting with

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1 the first bullet. "Provide consultation regarding 10:05AM
2 improvement on the GNETS strategic plan." 10:05AM

3 So you've mentioned the GNETS strategic 10:05AM
4 plan a few times. What is it? 10:05AM

5 A. It's a framework for the GNETS programs. 10:05AM

6 Q. Okay. All 24 regional programs? 10:05AM

7 A. Yes. 10:05AM

8 Q. Okay. In what ways do you provide consultation 10:06AM
9 regarding improvement on the GNETS strategic plan? 10:06AM

10 A. We always take a look at the strategic plan to 10:06AM
11 see what can be consolidated, if something is 10:06AM
12 repetitive, and just make changes as needed. If there 10:06AM
13 are any questions regarding any changes that were made 10:06AM
14 or when we do changes, if there's a training or a 10:06AM
15 presentation that needs to be completed, then I'll do 10:06AM
16 that. 10:06AM

17 Q. Okay. What type of changes would be made? 10:06AM

18 A. It just depends. We've made a few, so... 10:06AM

19 Q. Can you give me an example? 10:06AM

20 A. For example, we consolidated. It was seven 10:06AM
21 focused areas and we consolidated them into six, because 10:06AM
22 two of them had a lot of the same information. 10:07AM

23 Q. Okay. Got it. And do you also provide 10:07AM
24 consultation regarding improvement to the programs? 10:07AM

25 A. I don't provide consultation regarding 10:07AM

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1	improvement to the specific programs, no.	10:07AM
2	Q. Okay. And then do you see how this bullet --	10:07AM
3	there's a few that are somewhat highlighted.	10:07AM
4	A. Yes.	10:07AM
5	Q. Do you see that?	10:07AM
6	A. (Nodding yes.)	10:07AM
7	Q. Do you know why this bullet is highlighted?	10:07AM
8	A. I do not.	10:07AM
9	Q. Next bullet: "Complete GNETS end-of-year	10:07AM
10	reviews, provide ratings and feedback."	10:07AM
11	A. Yes.	10:07AM
12	Q. What are GNETS end-of-year reviews?	10:07AM
13	A. So the end-of-year reviews are the strategic	10:07AM
14	plan reviews.	10:07AM
15	Q. Okay. And this is for the original GNETS	10:07AM
16	programs?	10:07AM
17	A. Correct.	10:07AM
18	Q. Okay. Why is this bullet highlighted?	10:07AM
19	A. I have no idea.	10:07AM
20	Q. Okay. So how do you provide ratings?	10:07AM
21	A. Previously, we would go through each part of	10:07AM
22	the strategic plan, face-to-face with the GNETS -- each	10:08AM
23	of the GNETS directors, and they would provide evidence	10:08AM
24	of their ratings and then we would provide feedback.	10:08AM
25	Q. What basis did you --	10:08AM

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1	A. There was a rubric.	10:08AM
2	Q. There was a rubric. Okay. And is this how you	10:08AM
3	still -- you mentioned that this is not how you do it	10:08AM
4	anymore?	10:08AM
5	A. We no longer provide a specific rating.	10:08AM
6	Q. When did that change?	10:08AM
7	A. I would have to think about it honestly.	10:08AM
8	Q. Okay. Do you think it was in the last two	10:08AM
9	years?	10:08AM
10	A. It was before COVID.	10:08AM
11	Q. Before COVID. Okay. So 2020 and prior?	10:08AM
12	A. Somewhere around there.	10:08AM
13	Q. Okay.	10:08AM
14	A. 2019, maybe 2020.	10:08AM
15	Q. Okay. Do you have a rubric still?	10:08AM
16	A. It's still a rubric, yeah.	10:08AM
17	Q. Okay. So if they're not ratings, what are	10:08AM
18	you --	10:08AM
19	A. It's not a numerical rating.	10:08AM
20	Q. Okay.	10:08AM
21	A. It's operational evident, not evident.	10:09AM
22	Q. So still a score?	10:09AM
23	A. It's not necessarily a score, but...	10:09AM
24	Q. What would you describe them as?	10:09AM
25	A. If it was a number, I would say it was a score.	10:09AM

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1	Q. Sure.	10:09AM
2	A. We can say rating.	10:09AM
3	Q. Rating. Okay.	10:09AM
4	A. Yeah. Non-numerical.	10:09AM
5	Q. A non-numerical rating?	10:09AM
6	A. Yes.	10:09AM
7	Q. Is this done in conjunction with anyone else at	10:09AM
8	GaDOE?	10:09AM
9	A. No.	10:09AM
10	Q. So you work on these ratings alone?	10:09AM
11	A. Vickie, myself, the directors are there, but no	10:09AM
12	one outside of myself and Vickie from GaDOE.	10:09AM
13	Q. Okay. Does anyone else in GaDOE see the	10:09AM
14	ratings?	10:09AM
15	A. No.	10:09AM
16	Q. Okay. Does anyone else see the feedback?	10:09AM
17	A. No.	10:09AM
18	Q. Okay. Let's move on to the next bullet.	10:09AM
19	"Assist GNETS PM with strategic plan improvement	10:09AM
20	initiatives." And then in parenthesis it reads:	10:09AM
21	"Editing, testing changes in the portal, conduct	10:10AM
22	trainings, et cetera."	10:10AM
23	A. Yes.	10:10AM
24	Q. Okay. The GNETS PM is Vickie; is that correct?	10:10AM
25	A. Correct.	10:10AM

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1	Q. They're aware of their own data?	10:31AM
2	A. Mm-hmm.	10:31AM
3	Q. But you also reach out?	10:31AM
4	A. On occasion.	10:31AM
5	Q. Okay. Do you reach out if it's stagnant growth	10:31AM
6	as well?	10:32AM
7	A. I would have to think about that.	10:32AM
8	Q. Okay. Let's move to the next bullet: "Monitor	10:32AM
9	social worker logs, provide updates to the GNETS PM."	10:32AM
10	Can you tell me more about this bullet?	10:32AM
11	A. There are 11 programs that receive a	10:32AM
12	therapeutic grant for a social worker, and they're	10:32AM
13	required or they are asked to submit social worker logs	10:32AM
14	monthly.	10:32AM
15	Q. This therapeutic grant, is it through GaDOE?	10:32AM
16	A. Yes.	10:32AM
17	Q. And 11 of the 24 programs receive it?	10:32AM
18	A. Yes.	10:32AM
19	Q. How do they share this information with you?	10:32AM
20	A. Through the portal.	10:32AM
21	Q. Do you share -- what would you share as updates	10:33AM
22	with Vickie Cleveland?	10:33AM
23	A. The programs that haven't submitted their logs,	10:33AM
24	and I do a summary at the end of the year.	10:33AM
25	Q. Okay. For all 11?	10:33AM

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1	"Collaborate with GO-IEP team on pending changes in the	10:34AM
2	portal."	10:34AM
3	A. Yes.	10:34AM
4	Q. I know earlier you mentioned GO-IEP, but can	10:34AM
5	you explain it to me?	10:34AM
6	A. Georgia IEP is a statewide IEP program.	10:34AM
7	Q. Is Georgia IEP the same as GO-IEP?	10:34AM
8	A. It is.	10:34AM
9	Q. Okay. And how do you collaborate with the	10:34AM
10	GO-IEP team?	10:34AM
11	A. As they make updates specific to GNETS, they'll	10:34AM
12	reach out.	10:35AM
13	Q. The next one: "Co-facilitate GNETS directors	10:34AM
14	meetings."	10:35AM
15	A. Yes.	10:35AM
16	Q. All right. In this bullet it identifies those	10:35AM
17	meetings with regional GNETS program directors?	10:35AM
18	A. Correct.	10:35AM
19	Q. How often?	10:35AM
20	A. Usually monthly, if not every other month.	10:35AM
21	Q. Who do you co-facilitate with?	10:35AM
22	A. I co-facilitate with Vickie Cleveland.	10:35AM
23	Q. Who sets the agenda?	10:35AM
24	A. Vickie Cleveland.	10:35AM
25	Q. Do you discuss that with her in advance?	10:35AM

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1	A. Yes.	10:35AM
2	Q. And then are these meetings in-person?	10:35AM
3	A. Virtual, since COVID.	10:35AM
4	Q. In the past, have they been in-person?	10:35AM
5	A. They have been, yes.	10:35AM
6	Q. And what is --	10:35AM
7	A. We did both.	10:35AM
8	Q. I apologize.	10:35AM
9	A. Both virtual and in-person, even before COVID.	10:35AM
10	Q. Okay. Does that mean that some people are	10:35AM
11	in-person and some people are virtual?	10:35AM
12	A. No. Sometimes we'll have all in-person and	10:35AM
13	sometimes we would have all virtual, but that was	10:36AM
14	pre-COVID.	10:36AM
15	Q. Got it. So you were Zooming before -- before	10:36AM
16	we all were?	10:36AM
17	A. Yes.	10:36AM
18	Q. What is your role during these meetings?	10:36AM
19	A. To do the PowerPoint.	10:36AM
20	Q. Is the PowerPoint -- what is the PowerPoint for	10:36AM
21	the meetings, is it the agenda or is it a different	10:36AM
22	topic?	10:36AM
23	A. There are different presentations, different	10:36AM
24	presenters every month. And so if they have a	10:36AM
25	PowerPoint, I'll combine the PowerPoints and just do the	10:36AM

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1 presentation, and then just provide reminders of
2 anything that might need to be reminded about.

3 Q. Okay. "Advice GNETS staff and stakeholders on
4 State Board rules for GNETS."

5 A. Mm-hmm.

6 Q. Do you recall what State Board rules this
7 bullet is referring to?

8 A. The GNETS State Board rules.

9 Q. And then this -- it looks like this bullet is
10 plural. Is there another -- oh, no, it's State Board
11 rule. It's singular. I apologize.

12 Which GNETS staff do you advise on the
13 State Board rule?

14 A. I mean, we'll -- we might have the State Board
15 rule as a part of the presentation, so that's as much
16 advising as I would say for me.

17 Q. And the presentation is to the GNETS directors?

18 A. Yes.

19 Q. Do you ever present to other folks at regional
20 GNETS programs?

21 A. Other folks like who?

22 Q. Teachers --

23 A. No. I never interact with the teachers.

24 Q. And what do you-all advise related to State
25 Board rules and the presentation?

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1 A. I mean, it's not a conversation that's had
2 everyday or every month.

10:42AM

3 Q. Sure.

10:42AM

4 A. So as things come up and they need to be done,
5 if I'm asked to do them as a part of my job, I do.

10:42AM

6 Q. Do you currently work on any matters not
7 related to GNETS?

10:43AM

8 A. No.

10:43AM

9 Q. Do you know if anyone held the role of GNETS
10 program specialist before you?

10:43AM

11 A. I do not.

10:43AM

12 Q. You don't -- do you not know?

10:43AM

13 A. I don't know.

10:43AM

14 Q. Okay. Who have you worked with at the GaDOE,
15 while GNETS program specialist, in addition to Vickie
16 Cleveland?

10:43AM

17 A. Worked with in what way?

10:43AM

18 Q. Have you coordinated or collaborated with in
19 your work?

10:43AM

20 A. I've collaborated with a lot of people.

10:43AM

21 Q. A lot of people?

10:43AM

22 A. (Nodding yes.)

10:43AM

23 Q. Okay. I'm going to go through a few folks
24 then.

10:43AM

25 A. (Nodding yes.)

10:43AM

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1	Q. To be aware?	11:24AM
2	A. (Nodding yes.)	11:24AM
3	Q. So am I correct that GNETS students are served	11:24AM
4	in centers and school-based locations?	11:24AM
5	A. Yes.	11:24AM
6	Q. Do you know how many centers are being used	11:24AM
7	this school year?	11:24AM
8	A. I do not.	11:24AM
9	Q. Do you know how many centers were used last	11:24AM
10	school year?	11:24AM
11	A. I do not.	11:24AM
12	Q. Is this information that you would typically	11:24AM
13	have?	11:24AM
14	MS. JOHNSON: Objection.	11:24AM
15	THE WITNESS: Have like what?	11:24AM
16	Q. BY MS. TUCKER: Is this information that you	11:24AM
17	would typically know about the GNETS program, how many	11:24AM
18	centers there are --	11:24AM
19	MS. JOHNSON: Objection.	11:24AM
20	Q. BY MS. TUCKER: -- as GNETS program specialist?	11:24AM
21	A. That information is reported -- self-reported	11:24AM
22	by the GNETS directors in the grant application.	11:25AM
23	Q. Do you then take a look and --	11:25AM
24	A. I mean, if they put it in there as a part of my	11:25AM
25	review for the GrantApp, then I would look at it, but I	11:25AM

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1 easier to be electronic. That's the answer. 11:50AM

2 Q. I understand. Okay. 11:50AM

3 MS. TUCKER: Okay. I'd like the Court 11:50AM
4 Reporter to mark this document as Plaintiff's 11:50AM
5 Exhibit 423. 11:51AM

6 (Plaintiff's Exhibit 423 marked for 11:51AM
7 identification.) 11:51AM

8 MS. TUCKER: Actually, can we also go off 11:51AM
9 the record for one moment? 11:51AM

10 THE VIDEOGRAPHER: Yes. Stand by. 11:51AM

11 MS. TUCKER: Thank you. 11:51AM

12 THE VIDEOGRAPHER: Off the record at 11:51AM
13 11:52 a.m. 11:51AM

14 (Off the record.) 11:52AM

15 THE VIDEOGRAPHER: We are back on the 11:52AM
16 record at 11:54 a.m. 11:53AM

17 Q. BY MS. TUCKER: The Court Reporter just handed 11:53AM
18 you a document that was marked as Plaintiff's 11:53AM
19 Exhibit 423. The Bates number on the first page of this 11:53AM
20 exhibit is GA00953689. The most recent date on the 11:53AM
21 e-mail thread is November 18th, 2019, and it is an 11:53AM
22 e-mail from you -- 11:53AM

23 A. Mm-hmm. 11:53AM

24 Q. -- to the regional GNETS program directors, and 11:53AM
25 Vickie Cleveland is copied. The subject reads: 11:53AM

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1 "GrantApp PP." And will there is one attachment. 11:53AM
2 A. (Witness examining document.) 11:53AM
3 Q. Dr. Stevenson, do you recognize this e-mail 11:53AM
4 thread? 11:53AM
5 A. Yes. 11:53AM
6 Q. Okay. Am I correct that you presented to the 11:53AM
7 regional GNETS program directors on the GNETS grant 11:53AM
8 application? 11:53AM
9 A. Yes. 11:53AM
10 Q. And then the attachment which begins with 11:53AM
11 GA00953691 and then that says it's produced in native 11:53AM
12 format, which we then presented for PowerPoint. Do you 11:54AM
13 see that? 11:54AM
14 A. Yes. 11:54AM
15 Q. Is this the PowerPoint presentation you used? 11:54AM
16 A. Yes. 11:54AM
17 Q. Okay. Did you create this PowerPoint? 11:54AM
18 A. Yes. 11:54AM
19 Q. Is it still current? 11:54AM
20 A. (Witness examining document.) To the best of 11:54AM
21 my knowledge, without taking a lot of time, yes. 11:55AM
22 Q. Okay. And then given earlier you said that 11:55AM
23 there hasn't been any substantive changes to the 11:55AM
24 application, so this -- correct? 11:55AM
25 A. I'm thinking yes. 11:55AM

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<p>1 Q. How often do you give this training?</p> <p>2 A. There hasn't been any changes to the way the</p> <p>3 information is entered into the portal. So I have not</p> <p>4 had to train on how to enter the information into the</p> <p>5 portal again because that has not changed.</p> <p>6 Q. And that's what this --</p> <p>7 A. This was once we switch from paper to</p> <p>8 electronic.</p> <p>9 Q. Mm-hmm.</p> <p>10 A. This is showing the directors what it looks</p> <p>11 like. So I went through each individual page and showed</p> <p>12 them what it looked like in real time and then created</p> <p>13 this as a resource.</p> <p>14 Q. But it's not an annual training before the</p> <p>15 grant application is due?</p> <p>16 A. No. Unless there's a new director who needs to</p> <p>17 know how to put the information in.</p> <p>18 Q. Would that end up being like a one on one?</p> <p>19 A. That would be a one on one.</p> <p>20 Q. And you have presented to the GNETS program</p> <p>21 directors on this?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Can you walk me through the timeline of</p> <p>24 submitting the GNETS grant application, like, when does</p> <p>25 the application open?</p>	<p>11:55AM</p> <p>11:55AM</p> <p>11:55AM</p> <p>11:55AM</p> <p>11:55AM</p> <p>11:55AM</p> <p>11:56AM</p>
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1 A. So that information has changed, but how the
2 information is entered has not.

11:56AM

3 Q. Okay. So when is it opened now?

11:56AM

4 A. Now, in January.

11:57AM

5 Q. Okay. When did it used to be open?

11:57AM

6 A. I would have to think about that.

11:57AM

7 Q. Okay.

11:57AM

8 A. I know now it's January, though.

11:57AM

9 Q. When did it change to January?

11:57AM

10 A. Maybe in the last two years.

11:57AM

11 Q. The last two years. Okay. So it opens in
12 January, and if I was original GNETS program I would
13 apply in January for the school year that begins in
14 August; is that correct?

11:57AM

15 A. Yes. I think. It's for the fiscal year. So
16 if we're in FY '22, it would be for FY '23. So if we're
17 in FY '23, it would be for FY '24. So the up -- the
18 next fiscal year.

11:57AM

19 Q. Okay.

11:57AM

20 A. So in FY -- fiscal year '22, they apply for
21 fiscal year '23. Now we're in fiscal year '23, and they
22 would apply for fiscal year '24.

11:57AM

11:58AM

23 Q. When does the fiscal year start and end for
24 you-all?

11:58AM

11:58AM

25 A. I believe it's in June -- June or July.

11:58AM

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<p>1 Q. June or July. Okay. So if applied in 2 January -- if I was a regional GNETS director and I 3 applied for the grants in January of 2022, it was for 4 fiscal year '23?</p> <p>5 A. It's not due until May.</p> <p>6 Q. Okay.</p> <p>7 A. So it's opened in January, but they have until 8 May to complete it.</p> <p>9 Q. Okay. And it's submitted through the portal?</p> <p>10 A. Yes.</p> <p>11 Q. So once it's submitted in May, when it 12 closes --</p> <p>13 A. Mm-hmm.</p> <p>14 Q. -- how long is the review process of the 15 application?</p> <p>16 A. Well, it just depends because we have to go 17 through each one and look at the attachment, so it just 18 depends on how long it takes us to finish all of that.</p> <p>19 Q. Do you have a deadline to meet to make sure you 20 get it done in time for the next step?</p> <p>21 A. We have -- we try to have them done within a 22 month.</p> <p>23 Q. Within a month. So May. And then you have 24 like a month?</p> <p>25 A. Yeah.</p>	<p>11:58AM 11:59AM 11:59AM 11:59AM 11:59AM 11:59AM</p>
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1	Q. Okay. Who reviews?	11:59AM
2	A. Myself and Vickie.	11:59AM
3	Q. Do you review them all together?	11:59AM
4	A. We'll review them separately. We'll split the	11:59AM
5	list, 12 and 12, and then Vickie would always, you know,	11:59AM
6	look at mine also.	11:59AM
7	Q. Do you-all meet to discuss them?	11:59AM
8	A. Yes.	11:59AM
9	Q. Do you discuss her 12 as well?	11:59AM
10	A. Sometimes.	11:59AM
11	Q. What would you discuss within the grant	11:59AM
12	application with Vickie?	11:59AM
13	A. If someone didn't submit an attachment, or if	11:59AM
14	someone was having technical issues and they reached out	12:00PM
15	to me and I needed to reach out to IT, I might -- if I	12:00PM
16	had a question about something, she might answer it. So	12:00PM
17	it just depends.	12:00PM
18	Q. Okay. When are the regional GNETS programs	12:00PM
19	advised that their grant application has been approved?	12:00PM
20	A. So this year we are meeting with them	12:00PM
21	individually, and that's -- that started this year. So	12:00PM
22	we meet to discuss their GrantApp, and if any additional	12:00PM
23	documentation is needed.	12:00PM
24	Q. Okay. Just to make sure I understand, so in	12:00PM
25	May, once you receive them, you-all discuss, and then	12:00PM

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1	this summer you then met with the regional GNETS	12:00PM
2	programs about their application?	12:00PM
3	A. If there is something else that's needed.	12:00PM
4	Q. So would you meet with all 24 on this or just	12:00PM
5	if they need something?	12:01PM
6	A. And when we meet it's not necessarily -- well,	12:01PM
7	yeah. It could be if just something is needed or it	12:01PM
8	could be just a touch base like, hey, we got your	12:01PM
9	information and printout.	12:01PM
10	Q. Okay. And you started that in 2022?	12:01PM
11	A. Yes.	12:01PM
12	Q. But when -- so, I'm sorry. Let's go back.	12:01PM
13	When do they receive notice that they have funding?	12:01PM
14	A. So once we -- once we do the sign off, they get	12:01PM
15	a notification that the GrantApp has been signed off.	12:01PM
16	Q. And does that have to be before the beginning	12:01PM
17	of the fiscal year?	12:01PM
18	A. Within the best of our abilities.	12:01PM
19	Q. Does that mean it doesn't always happen?	12:02PM
20	A. 99 percent of the time it does.	12:02PM
21	Q. Are you thinking about a program that didn't --	12:02PM
22	A. It's not necessarily they didn't submit it,	12:02PM
23	they might just need to have some more information and	12:02PM
24	so you have to keep going back and forth, and then it's	12:02PM
25	summer and they're out and then they come back, so it	12:02PM

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1	just depends.	12:02PM
2	Q. When do they receive the funding from the	12:02PM
3	grant?	12:02PM
4	A. That, I don't know.	12:02PM
5	Q. Who would know?	12:02PM
6	A. Vickie.	12:02PM
7	Q. Do the regional GNETS programs answer different	12:02PM
8	questions on the grant applications, are there any	12:02PM
9	questions that are tailored?	12:02PM
10	A. No. They're all the same.	12:02PM
11	Q. Okay. So like North Metro has to provide the	12:02PM
12	exact same information that you and Alexander has to	12:02PM
13	provide?	12:02PM
14	A. Correct. Now how they provide it, is	12:02PM
15	different, because it's different for every program	12:02PM
16	because -- but there are certain things they all have to	12:02PM
17	provide.	12:02PM
18	Q. In addition to presenting on the portal and how	12:03PM
19	to access the application and reviewing the applications	12:03PM
20	with Vickie, what other roles do you have related to the	12:03PM
21	GNETS grant application?	12:03PM
22	A. That's it.	12:03PM
23	Q. Do you review them prior to submission in the	12:03PM
24	portal?	12:03PM
25	A. Well, as they're entering them, we can see it,	12:03PM

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1	Q. What -- which of your responsibilities would	12:09PM
2	allow you to do that?	12:09PM
3	A. Whatever Vickie asks me to do.	12:09PM
4	Q. Can you give --	12:09PM
5	A. It just depends.	12:09PM
6	Q. Can you give me an example?	12:09PM
7	A. I would have to think about that.	12:09PM
8	Q. Okay. We can also give you time right now or	12:09PM
9	we can come back to it later.	12:10PM
10	A. We can come back to it. That would give me a	12:10PM
11	little bit more time.	12:10PM
12	Q. Okay. I'll make a note.	12:10PM
13	I see that you called or you spoke with	12:10PM
14	Derrick. Does that mean you called Derrick?	12:10PM
15	A. Yes.	12:10PM
16	Q. Are most of these types of conversations done	12:10PM
17	via phone call or are they ever e-mailed?	12:10PM
18	A. Phone call for clarity.	12:10PM
19	Q. Can you do -- can you share it through the	12:10PM
20	portal?	12:10PM
21	A. Share -- no.	12:10PM
22	Q. Okay.	12:10PM
23	A. We can e-mail but --	12:10PM
24	Q. Okay.	12:10PM
25	A. -- for clarity, it's best to call.	12:10PM

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1 strategic plan, and your consultation with the regional
2 GNETS programs on the strategic plan.

12:39PM

3 A. Okay.

12:39PM

4 Q. What is the timeline of strategic review plan?
5 We just talked about the grant application timeline?
6 What is this timeline?

12:39PM

7 A. Well, we no longer review the strategic plan in
8 a way in which there is a timeline because we've made
9 changes. So the grant application and strategic plan
10 are now aligned. So the information that we would look
11 for in the strategic plan, they are attaching within the
12 grant application. So there is not a review as it was
13 in previous years. They do the end-of-year summary from
14 the strategic plan and the mid-year summary where they
15 rate themselves and make priorities for the different
16 areas, but we no longer go and sit and do reviews as in
17 the past.

12:39PM

12:40PM

18 Q. When did that happen?

12:40PM

19 A. This is 2022. It was either 2020 or 2021. I'm
20 not sure.

12:40PM

12:40PM

21 Q. So what is the strategic review plan? What
22 does it look like now, then?

12:41PM

12:41PM

23 A. It looks the same. It's still the framework.
24 It's still the framework for the program and the
25 framework for their programs. And it still has actions

12:41PM

12:41PM

12:41PM

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1 and things, but we're just not rating and reviewing the
2 strategic plan because now they're aligned -- it's
3 aligned with the GrantApp. So if you look at the grant
4 application and the strategic plan, you will see a lot
5 of the same information.

6 Q. But they still complete it in both places?

7 A. No, they no longer have to complete the grant
8 application in the portal. I mean, I'm sorry, the
9 strategic plan. They still have the complete the grant
10 application.

11 Q. Okay. So the strategic plan in 2020 or 2021 no
12 longer has to be the completed?

13 A. In the portal.

14 Q. In the portal.

15 A. They still have to have their strategic plan
16 information as a part of the framework for their
17 programs available, but we no longer require it to be
18 upload -- uploaded in the portal.

19 Q. Why is that? What made the change?

20 A. To streamline the process when a lot of the
21 information aligns with information that is requested
22 within the grant application.

23 Q. Okay. And then how do you receive the
24 strategic plan from the programs if it's not in the
25 portal?

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1	A. We do not receive the strategic plan. We	12:42PM
2	receive the summary.	12:42PM
3	Q. Uh-huh.	12:42PM
4	A. Mid-year and end-year summary. It's a one	12:42PM
5	pager.	12:42PM
6	Q. Mm-hmm.	12:42PM
7	A. And it is uploaded within the grant	12:42PM
8	application.	12:42PM
9	Q. Are you -- earlier when we spoke about the	12:42PM
10	strategic plan, I believe you said that there were	12:42PM
11	ratings of emerging, operational, and evident?	12:42PM
12	A. When we used to review the strategic plan and	12:42PM
13	go out and do the reviews and it was uploaded in the	12:42PM
14	portal, yes.	12:43PM
15	Q. And now when you receive the mid-year summary	12:43PM
16	and end-of-year summary?	12:43PM
17	A. They're rating themselves.	12:43PM
18	Q. And does GaDOE provide --	12:43PM
19	A. No.	12:43PM
20	Q. -- a rating?	12:43PM
21	A. No.	12:43PM
22	Q. And this happened in the last two years?	12:43PM
23	A. Mm-hmm.	12:43PM
24	Q. Do you -- does GaDOE provide any feedback	12:43PM
25	related to the mid-year summary or end of the year	12:43PM

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1	Q. Okay. Were these ratings tied to anything?	12:53PM
2	A. No.	12:53PM
3	Q. What would have happened if someone -- a	12:53PM
4	regional program had all emergings and not evident?	12:53PM
5	MS. JOHNSON: Objection.	12:53PM
6	THE WITNESS: I can't say because I've	12:53PM
7	never had that happen.	12:53PM
8	Q. BY MS. TUCKER: You never had that --	12:53PM
9	A. Since I've been with the program.	12:53PM
10	Q. And you've been with the program the entire	12:53PM
11	time it's had the operational, emerging, and not evident	12:53PM
12	because before it was numerical?	12:53PM
13	A. Right.	12:53PM
14	Q. Do you and Vickie have conversations with the	12:54PM
15	regional GNETS program -- I know you said they're	12:54PM
16	uploaded into the portal, but afterwards about their	12:54PM
17	scores, ratings?	12:54PM
18	A. A lot of times a conversation was happening	12:54PM
19	within the review so --	12:54PM
20	Q. Okay.	12:54PM
21	A. So there wasn't a lot of follow up needed.	12:54PM
22	MS. TUCKER: I'd like the Court Reporter to	12:54PM
23	mark this document as Plaintiff's Exhibit 427.	12:54PM
24	(Plaintiff's Exhibit 427 marked for	12:54PM
25	identification.)	12:54PM

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1 Q. BY MS. TUCKER: The Bates number on the first
2 page of the document is GA00960449. This is a
3 September 9th, 2020, e-mail from you to two e-mail
4 addresses with the domain at tcjackets.net, and Shawn
5 Owen and Vickie Cleveland and you were copied.

6 A. (Witness examining document.)

7 Q. The subject reads: "State suggested revision
8 on action items for Pathways Educational Program GNETS
9 strategic plan."

10 Dr. Stevenson, do you recognize this
11 e-mail?

12 A. This is a generated e-mail. It's not one I
13 typed.

14 Q. Oh. Can you explain that to me?

15 A. So in the portal, this is in 2020, so this was
16 a virtual review that took place cause by September,
17 that was COVID.

18 Q. Okay.

19 A. And the reviews were virtual. So once the
20 information is put in and I hit submit, she needed a
21 revision, and it automatically sends it. So it's not
22 something that -- it's not an e-mail I typed myself.

23 Q. I understand. So this happens when you put it
24 in other -- for other regional GNETS programs too?

25 A. So if they needed a revision on their strategic

12:54PM

12:54PM

12:55PM

12:56PM

12:56PM

12:56PM

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1 plan, it would say what section, what action item and
2 the finding.

12:56PM

3 Q. Okay.

12:56PM

4 A. But I didn't type the e-mail, no. It's auto
5 generated.

12:56PM

6 Q. Sure. Would the finding where it says "Section
7 action item finding,"-- excuse me, would you have typed
8 what's in after the finding into the portal and that
9 would have then --

12:56PM

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1	A. Well, I'm not sure if I gave them a rating if	12:57PM
2	they hadn't completely uploaded everything yet.	12:57PM
3	Q. I see Shawn Owen is copied.	12:57PM
4	A. Shawn is always copied on all auto-generated	12:57PM
5	because she's the deputy.	12:57PM
6	Q. Okay.	12:57PM
7	A. Anything that comes out of the portal to the --	12:57PM
8	to any -- not just with GNETS, with anybody.	12:57PM
9	Q. So she's getting lots of e-mails?	12:57PM
10	A. Yes.	12:57PM
11	Q. Have you or Vickie ever discussed any	12:57PM
12	feedbacks -- feedback related to the GNETS strategic	12:57PM
13	plan with Shawn Owen?	12:57PM
14	A. Not that I can recall. Not that I've been	12:57PM
15	involved.	12:57PM
16	Q. Okay. And then what -- the domain was at	12:57PM
17	tcjackets.net. Do you know who this was sent to?	12:57PM
18	A. I believe -- that's Pathways.	12:58PM
19	Q. Pathways. Which is one of the 24 regional	12:58PM
20	GNETS?	12:58PM
21	A. Mm-hmm.	12:58PM
22	Q. Yes?	12:58PM
23	A. Yes. I'm sorry.	12:58PM
24	Q. And then -- so similar e-mails like this went	12:58PM
25	out to the other regional GNETS programs?	12:58PM

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<p>1 A. If they needed revision, yes.</p> <p>2 Q. Okay. Do you give them a timeline on when to resubmit?</p> <p>4 A. Yes. I'm not sure what the timeline was at that time, though.</p> <p>6 Q. And does this function still exist given the change in the strategic plan?</p> <p>8 A. No, because we no longer do it like this, so no.</p> <p>10 Q. Okay. If it's okay, I just have one document to look at and then we can break.</p> <p>12 A. Okay.</p> <p>13 Q. Okay.</p> <p>14 MS. TUCKER: I'd like the Court Reporter to mark this document as Plaintiff's Exhibit 428.</p> <p>16 (Plaintiff's Exhibit 428 marked for identification.)</p> <p>18 Q. BY MS. TUCKER: The Bates number on the first page of this document is GA00963511. This is an e-mail thread with the most recent e-mail dated November 30th, 2020. And it's an e-mail from you to Moria Lenka, Upendra Nara, Vickie Cleveland, and --</p> <p>23 A. Udia.</p> <p>24 Q. Udia. Thank you. Udia Arumugam. Did I get that close?</p>	<p>12:58PM</p> <p>12:59PM</p> <p>12:59PM</p> <p>12:59PM</p> <p>12:59PM</p> <p>12:59PM</p> <p>12:59PM</p> <p>12:59PM</p> <p>12:59PM</p> <p>12:59PM</p>
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1	A. Close enough.	12:59PM
2	Q. Okay. It's spelled A-R-U-M-U-G-A-M.	12:59PM
3	The subject reads: "Draft Coastal Academy	01:00PM
4	FY '20 strategic plan results."	01:00PM
5	Dr. Stevenson, do you recognize this	01:00PM
6	e-mail?	01:00PM
7	A. Yes.	01:00PM
8	Q. Let's go through the two fields. Who -- can	01:00PM
9	you identify the folks listed in the two fields?	01:00PM
10	A. They are Moria, Upendra, and Udia.	01:00PM
11	Q. Okay.	01:00PM
12	A. They are all IT.	01:00PM
13	Q. Okay. And let's start with the oldest e-mail	01:00PM
14	in the thread, which begins on GA00963514.	01:00PM
15	A. (Witness complying.)	01:00PM
16	Q. Do you see it's sent Tuesday, November 24th,	01:00PM
17	2020 at 1459?	01:00PM
18	A. Mm-hmm.	01:00PM
19	Q. And it starts with, "Dear Lisa Futch"?	01:00PM
20	A. Mm-hmm.	01:00PM
21	Q. Was that a yes?	01:00PM
22	A. Yes. I'm sorry.	01:00PM
23	Q. Who is Lisa Futch?	01:00PM
24	A. Director in the GNETS program for Coastal	01:01PM
25	Academy.	01:01PM

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1 first paragraph. Do you see it?

01:02PM

2 MS. JOHNSON: (Indicating.)

01:02PM

3 THE WITNESS: Okay. Yes. I'm sorry.

01:02PM

4 Q. BY MS. TUCKER: I can read it again. "At the
5 end of the school year, the teams completed their final
6 ratings and prepared for a virtual review from the GNETS
7 state program manager and program specialist."

01:02PM

8 A. Mm-hmm.

01:02PM

9 Q. When this was drafted in 2020, was it going out
10 to every program?

01:02PM

11 A. The programs that received the virtual review.

01:02PM

12 Q. How many programs received the virtual review?

01:02PM

13 A. I don't remember.

01:02PM

14 Q. It was not all 24?

01:02PM

15 A. Not in 2020.

01:03PM

16 Q. How was it decided which programs received
17 virtual review?

01:03PM

18 A. Well, we weren't doing in-person, so that's how
19 that was decided.

01:03PM

20 Q. But what about the number of programs?

01:03PM

21 A. We decided to be in line with the RDA unit, and
22 they do Cross Functioning Monitoring on a three-year
23 cycle.

01:03PM

24 Q. Okay.

01:03PM

25 A. So to be on -- to be in line with them, we went

01:03PM

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1	A. Georgia Department -- GaDOE.	02:10PM
2	Q. Okay. You said you provide updates?	02:10PM
3	A. Mm-hmm.	02:10PM
4	Q. Updates on what?	02:10PM
5	A. Updates on changes that might be made to the	02:10PM
6	schedule for our monthly meetings or updates on due	02:10PM
7	dates for certain things or updates on webinars that are	02:10PM
8	going to be provided, not by us but by other people	02:10PM
9	outside on maybe special design instructions or things	02:10PM
10	like that. So just to make sure that they're aware of	02:10PM
11	those type of things that could be offered to them.	02:10PM
12	Q. Who sets the agenda for the monthly meetings?	02:10PM
13	A. Vickie usually, and myself.	02:10PM
14	Q. In consultation with you?	02:10PM
15	A. Mm-hmm.	02:10PM
16	Q. Are the agendas sent out in advance to the	02:10PM
17	regional GNETS programs?	02:10PM
18	A. No.	02:10PM
19	Q. I am going to introduce an exhibit that has	02:10PM
20	paper, but also there's going to be an electronic	02:10PM
21	component.	02:11PM
22	A. Okay.	02:11PM
23	MS. TUCKER: I'd like the Court Reporter to	02:11PM
24	mark this document as Plaintiff's Exhibit 429.	02:11PM
25	(Plaintiff's Exhibit 429 marked for	02:11PM

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1 identification.)

2 Q. BY MS. TUCKER: The Bates number on the bottom
3 of this documents reads, GA00956689. This is a
4 May 26th, 2020 e-mail from Vickie Cleveland to you. The
5 subject of the e-mail reads: "Draft responses." And
6 there is one attachment titled: "Copy of copy GNETS
7 director meeting questions, 2020-05-26."

8 A. (Witness examining document.)

9 Q. Dr. Stevenson, do you recognize this e-mail?

10 A. Yes.

11 Q. Yes?

12 A. Yes.

13 Q. Okay. We're going to turn to the attachment
14 which starts with GA00956690. But this is a
15 spreadsheet, so my colleague Megan Erickson is going to
16 share the screen and then you'll be able to access it.

17 THE VIDEOGRAPHER: And just let me know if
18 there's any issue with the screen share.

19 MS. TUCKER: I think it's about to happen.

20 Q. BY MS. TUCKER: Great. And then do you have
21 control over the document, Dr. Stevenson? I know you
22 see it.

23 A. Yes, I do.

24 Q. Okay. So you are able to manipulate and zoom
25 in and --

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1	A. Well, I can move the mouse.	02:12PM
2	Q. Okay. Are you able to zoom in?	02:12PM
3	THE VIDEOGRAPHER: Oh, you might have to	02:12PM
4	hit the plus sign or you can do this with your fingers	02:12PM
5	on the mouse pad.	02:13PM
6	THE WITNESS: Oh.	02:13PM
7	THE VIDEOGRAPHER: Do you want me to go off	02:13PM
8	the record?	02:13PM
9	MS. TUCKER: Yes, let's go off the record	02:13PM
10	just real quick.	02:13PM
11	THE VIDEOGRAPHER: All right. Off the	02:13PM
12	record at 2:14 p.m.	02:13PM
13	(Off the record at 2:14 p.m.)	02:13PM
14	THE VIDEOGRAPHER: Back on the record at	02:15PM
15	2:16 p.m.	02:15PM
16	Q. BY MS. TUCKER: Dr. Stevenson, are you now	02:15PM
17	looking at the spreadsheet that we identified as	02:15PM
18	GA0095690?	02:15PM
19	A. Yes.	02:15PM
20	Q. Okay. Do you recognize this spreadsheet?	02:15PM
21	A. Yes.	02:15PM
22	Q. Did you create it?	02:15PM
23	A. I created a form in Jotform --	02:15PM
24	Q. Okay.	02:15PM
25	A. -- where the GNETS directors -- since we were	02:15PM

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1 going virtual.

02:15PM

2 Q. Okay.

02:15PM

3 A. This would give them an opportunity to have
4 their questions answered ahead of time so we can make
5 sure that they were addressed.

02:15PM

6 Q. Okay. What is Jotform?

02:15PM

7 A. Jotform is a platform you can use to create
8 documents and send out to people for various things, so
9 I just used that to create this. And then after -- and
10 then it will automatically put it on Excel, if you
11 request it.

02:16PM

12 Q. Got it. And is this a form that you created
13 that then the regional GNETS directors could add to it?

02:16PM

14 A. Well, I would -- the Jotform would just say,
15 "Questions for monthly directors meeting," and then I
16 would send the link out.

02:16PM

17 Q. Okay.

02:16PM

18 A. And then they would put whatever questions they
19 would have for the upcoming meeting, that they might
20 need answered, so we could make sure that they were
21 addressed.

02:16PM

22 Q. And is this practice of answering questions
23 in -- having questions to answer in advance, is that
24 standard practice for your GNETS meetings with the
25 regional directors?

02:16PM

02:16PM

02:16PM

02:16PM

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1 A. It's wasn't -- it's not necessarily standard
2 practice, but in other departments within GaDOE we've
3 seen that and how it ensured that everybody's questions
4 got answered, so we thought it would be a good practice
5 to try to start using.

6 Q. Are you currently using this practice?

7 A. We -- we've only had one meeting, two meetings,
8 this year and I haven't done a Jotform for the meeting
9 so far this year.

10 Q. Have regional GNETS directors reached out with
11 questions in advance of the monthly meetings separate
12 from the Jotform?

13 A. Sometimes they'll have questions just in
14 general, but there might be questions that we're going
15 to address at the meeting.

16 Q. So am I correct, looking at this spreadsheet,
17 there's text and black font?

18 A. Mm-hmm.

19 Q. Those are the questions that you put in, that
20 you received from the regional GNETS directors?

21 A. Those are the questions that they put in
22 themselves.

23 Q. Okay.

24 A. So I didn't put in any questions. I just sent
25 a link and they had to select, you know, question, and

02:16PM

02:16PM

02:16PM

02:17PM

02:18PM

02:18PM

02:18PM

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1	then what their question was in regards to, and then	02:18PM
2	they put their questions in there.	02:18PM
3	Q. Did they also identify the topic or did you	02:18PM
4	identify --	02:18PM
5	A. They had options to choose from for the topic.	02:18PM
6	Q. Okay. And now I see answers in red, red front?	02:18PM
7	A. Yes.	02:18PM
8	Q. Who wrote the red font?	02:18PM
9	A. Vickie.	02:18PM
10	Q. Vickie. Okay. And are these red font answers	02:18PM
11	something that you would share in advance of the meeting	02:18PM
12	or is this something that you would discuss at the	02:18PM
13	meeting?	02:18PM
14	A. These would be the answers Vickie would give	02:18PM
15	them at the meeting.	02:18PM
16	Q. Verbally?	02:18PM
17	A. Yes.	02:18PM
18	Q. Did Vickie ask you to create a spreadsheet like	02:18PM
19	this through Jotform?	02:18PM
20	A. No. Like I said, we just thought it would be a	02:18PM
21	good idea to make sure questions were being addressed.	02:18PM
22	Q. The last two meetings that you've had this	02:18PM
23	school year, you think one or two?	02:19PM
24	A. Mm-hmm.	02:19PM
25	Q. Did any regional GNETS directors send you	02:19PM

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1	general.	02:42PM
2	Q. Do you and Vickie receive information, like,	02:42PM
3	called out for the GNETS students?	02:42PM
4	A. I don't know if they have that disseminated or	02:42PM
5	broken up by GNETS specifics for dropouts.	02:42PM
6	Q. Okay. I'm going to give you another one that	02:43PM
7	has an electronic component.	02:43PM
8	A. Okay.	02:43PM
9	MS. TUCKER: I'm handing the Court Reporter	02:43PM
10	what I would like marked as Plaintiff's Exhibit 431.	02:43PM
11	(Plaintiff's Exhibit 431 marked for	02:43PM
12	identification.)	02:43PM
13	Q. BY MS. TUCKER: This is a September 4th, 2019	02:43PM
14	e-mail from you to the regional GNETS program directors,	02:43PM
15	and Vickie Cleveland is copied. The Bates number on the	02:43PM
16	first page of this exhibit reads GA00951657. The	02:43PM
17	subject reads: "Social worker logs." And there's one	02:43PM
18	attachment.	02:44PM
19	A. (Witness examining document.)	02:44PM
20	Q. Dr. Stevenson, do you recognize this e-mail?	02:44PM
21	A. Yes.	02:44PM
22	Q. Okay. And am I correct that you write that	02:44PM
23	GaDOE requires monthly logs detailing the therapeutic	02:44PM
24	services provided by social workers?	02:44PM
25	A. Mm-hmm. Yes.	02:44PM

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1	Q. Is this to all regional GNETS program	02:44PM
2	directors?	02:44PM
3	A. 11.	02:44PM
4	Q. 11. And these are the 11 that receive the	02:44PM
5	grant?	02:44PM
6	A. The therapeutic grant.	02:44PM
7	Q. Okay. We just -- we'll be good without talking	02:44PM
8	over one another.	02:44PM
9	What do you do with the information once	02:44PM
10	you receive it?	02:44PM
11	A. I log that it has been submitted and then at	02:44PM
12	the end of the year I do a summary.	02:44PM
13	Q. Okay. And that's the summary we looked at	02:44PM
14	earlier?	02:44PM
15	A. Yes.	02:44PM
16	Q. Is this still current practice?	02:44PM
17	A. Yes.	02:44PM
18	Q. Okay. I want you to look at the spreadsheet,	02:44PM
19	which was produced in its native format so my colleague	02:45PM
20	will show it through Zoom. Let me know when you can see	02:45PM
21	it, Dr. Stevenson.	02:45PM
22	A. I can see it.	02:45PM
23	Q. Okay. Dr. Stevenson, did you create this	02:45PM
24	spreadsheet?	02:45PM
25	A. I'm not sure if I created it or not, or if it	02:45PM

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1 MS. JOHNSON: Yes.

2 MS. TUCKER: I'll just start back, so we're
3 on the same page.

4 MS. JOHNSON: Okay.

5 Q. BY MS. TUCKER: I handed you what was
6 identified already as Plaintiff's Exhibit 387?

7 A. Yes.

8 Q. Okay. And this is an e-mail thread with the
9 most recent e-mail dated November 2nd, 2020 from you to
10 Vickie Cleveland, and the subject is: "Form." There is
11 one attachment.

12 Dr. Stevenson, do you recognize this e-mail
13 thread?

14 A. Yes.

15 Q. Okay. Let's go down to the first e-mail in the
16 thread, which is at the bottom of GA00363543. And this
17 is a October 30th, 2020 e-mail to Joanna Mock from
18 Whitney Braddock. Do you see that e-mail?

19 A. Yes.

20 Q. Okay. Who are Whitney Braddock and Joanna
21 Mock?

22 A. GNETS directors.

23 Q. For which programs?

24 A. Whitney is for Cedarwood and Joanna Mock is for
25 Heartland?

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1 Q. Okay. And do you see where Joanna writes: "I
2 used the form that Lakesha sent to us and made a Word
3 document." Do you see that?

4 A. Yes.

5 Q. Okay. What form did you send the regional
6 GNETS directors?

7 A. (Witness examining document.) The form that
8 was, basically, what you see in the attachment.

9 Q. Okay. And you're saying that the form included
10 the information in the attachment, which starts at
11 GA00363545 --

12 A. (Witness examining document.)

13 Q. -- at the bottom; is that correct?

14 A. (Witness examining document.) Yes.

15 Q. And then the whole form which goes through
16 GA00363546 and GA00363547?

17 A. Not the form but information -- some of the
18 information that's in the form.

19 Q. Is there information in this form that you did
20 not request?

21 A. It's in a different manner in which it was
22 requested.

23 Q. What manner did you request it in?

24 A. I don't remember the specifics.

25 Q. But you remember it's different?

03:06PM

03:07PM

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1	A. I remember that this is not the exact form that	03:07PM
2	I sent, but it is very similar.	03:07PM
3	Q. Okay. And you were requesting this information	03:08PM
4	from the regional GNETS directors?	03:08PM
5	A. Yes.	03:08PM
6	Q. Okay. When you requested this from the	03:08PM
7	regional GNETS directors, what did you communicate?	03:08PM
8	A. What I put in the e-mail?	03:08PM
9	Q. Yeah.	03:08PM
10	A. I don't remember.	03:08PM
11	Q. Or a phone call?	03:08PM
12	A. I don't remember.	03:08PM
13	Q. Did you originally send it via e-mail?	03:08PM
14	A. I think so.	03:08PM
15	Q. Okay.	03:08PM
16	A. I think so.	03:08PM
17	Q. And you solely requested the information?	03:08PM
18	A. Just a little bit more clarity, I'm sorry.	03:08PM
19	Q. Yeah. Did you provide context on why you were	03:08PM
20	requesting this information to the regional GNETS	03:08PM
21	program directors?	03:08PM
22	A. I'm not sure because I don't remember how that	03:08PM
23	communication went out.	03:08PM
24	Q. Okay. Let's go back to the e-mail thread.	03:08PM
25	Am I correct that Joanna Mock then sends	03:09PM